

A.J. Eggenberger, Chairman  
John E. Mansfield, Vice Chairman  
Joseph F. Bader  
Larry W. Brown  
Peter S. Winokur

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700 Washington, D.C. 20004-2901  
(202) 694-7000



January 22, 2009

The Honorable Thomas P. D'Agostino  
Administrator  
National Nuclear Security Administration  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0701

Dear Mr. D'Agostino:

The Defense Nuclear Facilities Safety Board (Board) is conducting a series of reviews to evaluate the efforts of the Department of Energy/National Nuclear Security Administration (NNSA) to reinvigorate activity-level Integrated Safety Management (ISM). Recently, the Board's staff conducted a review of work planning and control processes and their execution by Babcock & Wilcox Technical Services Y-12 (B&W) at the Y-12 National Security Complex (Y-12). This review, which addressed maintenance and production work, found many deficiencies in the implementation of work planning and control processes.

Although B&W's work planning and control directives provide a solid framework for ensuring worker safety, deficiencies in implementation and coordination of these processes require improvement to achieve consistency with NNSA requirements. Many of these requirements can be found in the NNSA document *Activity Level Work Planning and Control Processes: Attributes, Best Practices, and Guidance for Effective Incorporation of Integrated Safety Management and Quality Assurance*. These deficiencies include (1) incomplete hazard analyses, (2) poor coordination of work management processes between maintenance, production, and health and safety organizations, (3) errors in pre-approved work packages used to perform repetitive but not necessarily simple or low-hazard tasks, and (4) outdated work packages that do not reflect current scope of work. These errors resulted in insufficient controls for authorized work. B&W placed some work activities on hold until work planning problems identified by the staff could be resolved and corrected.

The Board's staff found that YSO has an active program for monitoring and evaluating B&W's work planning and control. This program encompasses a wide spectrum of involvement in oversight activities and effective communications with B&W, and had correctly identified the broad need for improvement in work planning and control. However, the Board's staff discovered deficiencies in B&W work planning and control that YSO oversight had yet to identify. YSO management attributed their inability to provide more effective oversight of B&W work planning and control processes to insufficient resources. In addition to adequate

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resourcing, DOE/NNSA Headquarters could offer considerable benefit to YSO's work planning and control oversight efforts by providing the impetus and tools necessary to identify problems and drive corrective actions. In particular, YSO efforts would improve with (1) issuance of a work planning and control technical standard in the DOE directives system, (2) issuance of a guide supporting DOE Order 226.1, *Implementation of Department of Energy Oversight Policy* that includes a criteria review and approach document for critical work activities, and (3) staffing NNSA headquarters to support activity-level work planning.

The Board believes that when the deficiencies in implementation and coordination are effectively corrected, the B&W work planning and control directives system will be much more effective. The enclosed report details the deficiencies identified by the Board's staff and provides observations from the staff's review for your use in improving work planning and control at Y-12.

Sincerely,



A. J. Eggenberger  
Chairman

Enclosure

c: The Honorable William C. Ostendorff  
Mr. Theodore D. Sherry  
Mr. Glenn S. Podonsky  
Mr. Mark B. Whitaker, Jr.